

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD APRIL 5, 2023 THROUGH APRIL 30, 2023**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition Date")

**SECTION 1
FEE SUMMARY**

Interim Fee Application No. _____ or Final Fee Application

Summary of Amounts Requested for the Period from April 5, 2023 through April 30, 2023 (the "First Statement Period").

Total Fees – LTL Bankruptcy:	\$125,033.00
Total Fees – Imerys Bankruptcy (50% of total):	+ <u>\$0.00</u>
Total Fees:	\$125,033.00
Total Disbursements:	+ <u>\$0.00</u>
Total Fees Plus Disbursements:	\$125,033.00
Minus 20% Holdback of Fees:	– <u>\$25,006.60</u>
Amount Sought at this Time:	<u>\$100,026.40</u>

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	<u>\$0.00</u>	<u>\$0.00</u>	<u>\$0.00</u>
Total Fees Allowed to Date:	<u>\$0.00</u>	<u>\$0.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>\$347,805.00¹</u>	<u>N/A</u>	<u>\$347,805.00</u>
Total Holdback (If Applicable):	<u>\$0.00</u>	<u>\$0.00</u>	<u>\$0.00</u>
Total Received by Applicant:	<u>\$347,805.00</u>	<u>\$0.00</u>	<u>\$347,805.00</u>

¹ Prior to this bankruptcy filing, Bates White received a payment from LTL of \$350,000.00. From April 1 through April 4, 2023, Bates White incurred \$2,195.00 in professional fees for services provided to the Debtor, which were paid by deducting those fees from the pre-filing payment.

Summary by timekeeper included in this Fee Application – LTL Bankruptcy

Name of Professional	Title	Rate	Hours	Fees
Evans, Andrew	Partner	\$1,000	38.2	\$38,200.00
Lobel, Scott	Partner	\$875	36.7	\$32,112.50
Mullin, Charles	Partner	\$1,375	6.5	\$8,937.50
Peters, Sarah	Managing Consultant	\$675	12.1	\$8,167.50
Stewart, Samantha	Senior Consultant	\$520	27.3	\$14,196.00
Odio-Zuniga, Mariana	Economist	\$525	7.6	\$3,990.00
Coleman, Nathan	Consultant II	\$465	1.3	\$604.50
Morey, Austin	Consultant II	\$435	7.7	\$3,349.50
Swope, Madison	Consultant II	\$435	15.5	\$6,742.50
McBride, Hannah	Consultant	\$410	21.3	\$8,733.00
TOTAL			174.2	\$125,033.00

Summary by timekeeper included in this Fee Application – Imerys Bankruptcy

Name of Professional	Title	Rate	Hours	Fees
N/A			N/A	N/A
TOTAL			0.0	\$0.00
50% OF TOTAL			0.0	\$0.00

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED – LTL BANKRUPTCY	HOURS	FEES
Analysis	105.2	\$75,640.00
Client Communication	13.2	\$10,618.00
Data Gathering & Processing	11.1	\$4,933.50
Fee Request Preparation	0.2	\$104.00
Project Management	25.4	\$22,963.50
Research	19.1	\$10,774.00
SERVICES TOTAL	174.20	\$125,033.00

SERVICES RENDERED – IMERYS BANKRUPTCY	HOURS	FEES
N/A	N/A	N/A
SERVICES TOTAL	0.0	\$0.00
50% OF SERVICES TOTAL	0.0	\$0.00

SECTION III
SUMMARY OF DISBURSEMENTS

DISBURSEMENT TYPE – LTL BANKRUTPCY	AMOUNT
N/A	N/A
DISBURSEMENTS TOTAL	\$0.00

DISBURSEMENT TYPE – IMERYS BANKRUTPCY	AMOUNT
N/A	N/A
DISBURSEMENTS TOTAL	\$0.00

SECTION IV CASE HISTORY

1. Case Filed: April 4, 2023 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: June 7, 2023, effective as of the Petition Date [Dkt. 723] (the “Retention Order”).²
4. Summary explaining the nature of the work performed and the results achieved:³

During the First Statement Period, Bates White provided the following services including, but not limited to:

- Analyzing key factors related to claim values for the plan and trust.
- Researching and analyzing claims data.
- Preparing retention application and materials related to retention application

I certify under penalty of perjury that the above is true.

Dated: July 11, 2023
Washington, DC

Respectfully submitted,

/s/ Scott M. Lobel
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TALC CONSULTANTS FOR DEBTOR

² The Retention Order is attached hereto as Exhibit B.

³ The invoice detail submitted hereto as Exhibit C, respectively, includes detailed time entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.